

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO, et al.,	§	
Plaintiffs,	§	
	§	
v.	§	Case No. 5:21-CV-0844-XR
	§	
GREGORY W. ABBOTT, et al.,	§	
Defendants.	§	

	§	
OCA-GREATER HOUSTON, et al.,	§	
Plaintiffs,	§	
	§	
v.	§	Case No. 1:21-CV-0780-XR
	§	
JOSE A. ESPARZA, et al.,	§	
Defendants.	§	

	§	
HOUSTON JUSTICE, et al.,	§	
Plaintiffs,	§	
	§	
v.	§	Case No. 5:21-CV-0848-XR
	§	
GREGORY WAYNE ABBOTT, et al.,	§	
Defendants.	§	

	§	
LULAC TEXAS, et al.,	§	
Plaintiffs,	§	
	§	
v.	§	Case No. 1:21-CV-0786-XR
	§	
JOSE ESPARZA, et al.,	§	
Defendants.	§	

	§	
MI FAMILIA VOTA, et al.,	§	
Plaintiffs,	§	
	§	
v.	§	Case No. 5:21-CV-0920-XR
	§	
GREG ABBOTT, et al.,	§	
Defendants.	§	

OCA-GREATER HOUSTON, ET AL., PLAINTIFFS' INITIAL DISCLOSURES

TO: Consolidated Plaintiffs La Union Del Pueblo Entero, Southwest Voter Registration Education Project, Mexican American Bar Association of Texas, Texas Hispanics Organized for Political Education, JOLT Action, William C. Valasquez Institute, and Fiel Houston, Inc by and through their attorneys of record Nina Perales, Christopher H. Bell, Julia Renee Longoria, Michael C. Keats, and Rebecca L. Martin, via e-mail to nperales@maldef.org, christopher.bell@friedfrank.com, jlongoria@maldef.org, michael.keats@friedfrank.com, and rebecca.martin@friedfrank.com.

Consolidated Plaintiffs Friendship-West Baptist Church, The Anti-Defamation League Austin, Southwest, and Texoma, and Texas Impact by and through their attorneys of record Elizabeth Yvonne Ryan, Paul R. Genender, Sean Morales-Doyle, Alexander P. Cohen, Andrew B. Garber, Eliza Sweren-Becker, Jasleen K. Singh, Matthew Berde, and Patrick A. Berry, via e-mail to liz.ryan@weil.com, paul.genender@weil.com, morales-doyles@brennan.law.nyu.edu, alexander.cohen@weil.com, andrew.garber@nyu.edu, sweren-beckere@brennan.law.nyu.edu, jasleen.singh@nyu.edu, matt.berde@weil.com, and patrick.berry@nyu.edu.

Consolidated Plaintiffs James Lewin by and through his attorneys of record Christian Dashaun Menefee, Jonathan Gabriel Chaim Fombonne, Sameer Singh Birring, Sean Morales-Doyle, Alexander P. Cohen, Andrew B. Garber, Eliza Sweren-Becker, Jasleen K. Singh, Matthew Berde, and Patrick A. Berry, via e-mail to Christian.Menefee@cao.hctx.net, jonathan.fombonne@cao.hctx.net, sameer.birring@cao.hctx.net, morales-doyles@brennan.law.nyu.edu, alexander.cohen@weil.com, andrew.garber@nyu.edu, sweren-beckere@brennan.law.nyu.edu, jasleen.singh@nyu.edu, matt.berde@weil.com, and patrick.berry@nyu.edu.

Consolidated Plaintiffs Mi Familia Vota, Marla Lopez, Marlon Lopez, and Paul Rutledge by and through their attorneys of record Ben Clements, Laura E. Rosenbaum, Wendy J. Olson, Courtney M. Hostetler, Elijah M. Watkins, John Bonifaz, Marc T. Rasich, Ronald A. Fein, and Sean Michael Lyons, via e-mail to bclements@freespeechforpeople.org, laura.rosenbaum@stoel.com, wendy.olson@stoel.com, chostetler@freespeechforpeople.org, elijah.watkins@stoel.com, jbonifaz@freespeechforpeople.org, marc.rasich@stoel.com, rfein@freespeechforpeople.org, and sean@lyonsandlyons.com.

Consolidated Plaintiffs Houston Justice, Houston Area Urban League, Delta Sigma Theta Sorority Inc., The Arc of Texas, and Jeffrey Lamar Clemmons by and through their attorneys of record Georgina Yeomans, J. Keely Dulaney, Jennifer A. Holmes, Kathryn Sadasivan, Kenneth E. Broughton, Jr., Lora Spencer, Sarah M. Cummings, and Shira Wakschlag, via e-mail to gyeomans@naacpldf.org, kdulaney@reedsmith.com, jholmes@naacpldf.org, ksadasivan@naacpldf.org, kbroughton@reedsmith.com, lspencer@reedsmith.com, scummings@reedsmith.com, and wakschlag@thearc.org.

Consolidated Plaintiff LULAC Texas by and through its attorneys of record Domingo A. Garcia, Graham White, John Russell Hardin, Jonathan Patrick Hawley, Joseph N. Posimato, Kathryn E. Yukevich, Marc Erik Elias, Meaghan E. Mixon, and Uzoma N. Nkwonta, via e-mail to domingo@dgley.com, gwhite@elias.law, johnhardin@perkinscoie.com, jhawley@elias.law, jposimato@elias.law, kyukevich@elias.law, melias@elias.law, mmixon@elias.law, and unkwonta@elias.law.

Consolidated Plaintiffs Vote Latino, Texas Alliance for Retired Americans, and Texas AFT by and through their attorneys of record Graham White, John Russell Hardin, Jonathan Patrick Hawley, Joseph N. Posimato, Kathryn E. Yukevich, Marc Erik Elias, Meaghan E. Mixon, and Uzoma N. Nkwonta, via e-mail to gwhite@elias.law, johnhardin@perkinscoie.com, jhawley@elias.law, jposimato@elias.law, kyukevich@elias.law, melias@elias.law, mmixon@elias.law, and unkwonta@elias.law.

Defendants Texas Governor, Texas Secretary of State, and Texas Attorney General by and through their attorneys of record Eric A. Hudson, Jeffrey Michael White, and Patrick K. Sweeten, via e-mail to eric.hudson@oag.texas.gov, jeff.white@oag.texas.gov, Patrick.Sweeten@oag.texas.gov, Elizabeth.Saunders@oag.texas.gov, Will.Thompson@oag.texas.gov, Kathleen.Hunker@oag.texas.gov, and Leif.Olson@oag.texas.gov.

Consolidated Defendant Medina County Elections Administrator by and through her attorneys of record Chad Ennis and Robert E. Henneke, via e-mail to cennis@texaspolicy.com, rhenneke@texaspolicy.com, and ysimental@texaspolicy.com.

Consolidated Defendant El Paso County Elections Administrator by and through her attorneys of record Angelica Lien Leo, Beatriz Mejia, Christine Sun, Germaine Habell, Kathleen Hartnett, Kelsey Spector, Orion Armon, Ranjana Natarajan, Sharon Song, and Zack Goldberg, via e-mail to aleo@cooley.com, mejiab@cooley.com, christine@statesuniteddemocracy.org, ghabell@cooley.com, khartnett@cooley.com, kspector@cooley.com, oarmon@cooley.com, ranjana@statesuniteddemocracy.org, song@cooley.com, and zack@statesuniteddemocracy.org.

Defendant Harris County Elections Administrator by and through her attorneys of record Jonathan Gabriel Chaim Fombonne and Sameer Singh Birring, via e-mail to jonathan.fombonne@cao.hctx.net and sameer.birring@cao.hctx.net.

Consolidated Defendant Bexar County Elections Administrator by and through her attorneys of record Robert D. Green, via e-mail to Robert.green@bexar.org.

Consolidated Defendant Hidalgo County Elections Administrator by and through her attorneys of record Josephine L. Ramirez and Leigh Ann Tognetti, via e-mail to josephine.ramirez@da.co.hidalgo.tx.us and leigh.tognetti@da.co.hidalgo.tx.us.

Consolidated Defendant Dallas County Elections Administrator by and through his attorneys of record Barbara S. Nicholas, Ben L. Stool, and Earl S. Nesbitt, via e-mail to

Barbara.Nicholas@dallascounty.org, ben.stool@dallascounty.org,
earl.nesbitt@dallascounty.org, and kim.barr@dallascounty.org.

Defendant Travis County Clerk by and through her attorneys of record Anthony J. Nelson, Leslie W. Dippel, Patrick T. Pope, and Sherine Elizabeth Thomas, via e-mail to tony.nelson@traviscountytx.gov, leslie.dippel@traviscountytx.gov, patrick.pope@traviscountytx.gov, and sherine.thomas@traviscountytx.gov.

Movant Public Interest Legal Foundation by and through its attorney of record Andy Taylor via e-mail to ataylor@andytaylorlaw.com.

Movants Harris County Republican Party, Dallas County Republican Party, National Republican Senatorial Committee, and National Republican Congressional Committee by and through their attorney of record John M. Gore via e-mail to jmgore@jonesday.com.

Plaintiffs make these initial disclosures as required by Federal Rule of Civil Procedure 26 and reserve the right to supplement these initial disclosures at a later date.

- 1. The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment;**

John B. Scott
P.O. Box 12697
Austin, Texas 78711-2697
(512) 463-5770

John B. Scott is the Texas Secretary of State and a Defendant in his official capacity. He serves as the Chief Election Officer of the State of Texas, and is likely to have discoverable information related to the implementation of various provisions of the Texas Election Code, forms created and used by election authorities, and similar documents and information.

Ken Paxton
PO Box 12548
Austin, TX 78711-2548
(512) 463-2100

Ken Paxton is the Attorney General of Texas and a Defendant in his official capacity. He serves as the Chief Law Enforcement Officer of the State of Texas, and is likely to have discoverable information related to the prosecution of criminal offenses pursuant to the Texas Election Code, the role, scope, and function of his “Election Integrity Unit,” policies and procedures related to investigation and prosecution of criminal offenses at issue in this case, and similar documents and information.

Dana DeBeauvoir

300 E. WM J. Bryan Pkwy, Suite 100
Bryan, Texas 77803
(979) 361-5770

Dana DeBeauvoir is the Travis County Clerk and a Defendant in her official capacity. She is likely to have discoverable information related to the enforcement and application of the statutes at issue in this case, the prevalence and details relating to mail-in voting in the county, the prevalence and details relating to assistance provided to voters in the county, public accommodations, and the enforcement of various other criminal and civil penalties in the Texas Election Code.

Isabel Longoria

1001 Preston
Houston, TX 77002
(713) 755-6965

Isabel Longoria is the Harris County Elections Administrator and a Defendant in her official capacity. She is also a Plaintiff in a consolidated case with affirmative claims unrelated to the claims brought by Plaintiffs in this suit. She is likely to have discoverable information related to the enforcement and application of the statutes at issue in this case, the prevalence and details relating to mail-in voting in the county, the prevalence and details relating to assistance provided to voters in the county, public accommodations, and the enforcement of various other criminal and civil penalties in the Texas Election Code.

Patsy Spaw

P.O. Box 12068
Austin, Texas 78711
(512) 463-0100
Fax: 512/463-6034

Patsy Spaw is the Secretary of the Texas Senate and the person who responded to Plaintiffs' Public Information requests regarding written testimony taken into the record by the Texas Senate in consideration of the provisions at issue in this case.

Justin W. Williamson

Address Unknown
(512) 463-0733

Justin W. Williamson is the Chief of Staff to Texas House Elections Committee Chair Briscoe Cain and the person who responded to Plaintiffs' Public Information requests regarding written testimony taken into the record by the Texas House Elections Committee during its consideration of the provisions at issue in this case.

Grace Chimene

May be contacted through Plaintiffs' Counsel named below

Grace Chimene is the President of the League of Women Voters of Texas. She has general knowledge of the operations of the organization and the activities of its members and subordinate components.

Michelle Tremillo

May be contacted through Plaintiffs' Counsel named below

Michelle Tremillo is the Executive Director of the Texas Organizing Project. She has general knowledge of the operations of the organization and the activities of its members and programs.

Bob Kafka

May be contacted through Plaintiffs' Counsel named below

Bob Kafka is the President of REV-UP Texas. He has general knowledge of the operations of the organization and the activities of its members. Additionally, he is likely to have general information regarding the needs of voters with disabilities across Texas.

Ruben Fernandez

May be contacted through Plaintiffs' Counsel named below

Ruben Fernandez is a member of REV-UP Texas and voter with disabilities residing in El Paso County.

Albert Metz

May be contacted through Plaintiffs' Counsel named below

Albert Metz is a member of REV-UP Texas and voter with disabilities residing in Travis County.

Deborah Chen

May be contacted through Plaintiffs' Counsel named below

Deborah Chen is the Civic Engagement Program Director for OCA-Greater Houston. She has general knowledge of the operations of the organization, its civic engagement programs, and the activities of its members and subordinate components. Additionally, she is likely to have general information about the needs of Asian-American voters throughout Texas, including in Harris, Fort Bend, and Travis counties.

Emily Timm

May be contacted through Plaintiffs' Counsel named below

Emily Timm is the Co-Executive Director of the Workers Defense Action Fund. She has general knowledge of the operations of the organization and the activities of its members and subordinate components.

2. **A copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment;**

Plaintiffs have copies of the following information:

Responses from Texas Legislative Offices to Public Information Act Requests for Information Relating Written Testimony Submitted to the Legislature on proposed bills including provisions similar or identical to those at issue in this case—voluminous materials entered into the official record of legislative committees as they considered the provisions of SB1 and/or its predecessor bills, including written testimony submitted by the Plaintiffs in this case prior to passage of the bill.

Early Voting Ballot Board Handbook—guidance for operation of an Early Voting Ballot Board provided to local governments by the Texas Secretary of State.

Plaintiff League of Women Voters of Texas Materials Relating to voting by mail, voter outreach, and assistance at the polls—educational videos, informational webpages, powerpoints, social media and e-mail communications, surveys, and training scripts aimed at educating voters and members about the mail-in ballot process, the ability to have assistance at the polls, and general voter engagement strategies.

Plaintiff REV-UP Texas Materials Relating to voting by mail, voter outreach, and assistance at the polls—e-mails, digital media, and a social media posts, trainings, and communications aimed at educating voters about the mail-in ballot process, obtaining and usage of assistance at the polls, and outreach to voters.

Plaintiff Texas Organizing Project Materials Relating to voting by mail, voter outreach, and assistance at the polls—training materials and scripts for canvassers, social media and e-mail outreach correspondence, mailers, voter assistance/rides to polls training materials.

Plaintiff OCA-Greater Houston Materials Relating to voting by mail, voter outreach, and assistance at the polls—training materials and scripts for canvassers, social media and e-mail outreach correspondence, mailers, voter assistance/rides to polls training materials, Asian-language materials, Asian-language assistant recruiting materials and communications, event flyers and programs.

Plaintiff Workers Defense Action Fund Materials Relating to voting by mail, voter outreach, and assistance at the polls—canvassing training materials and scripts, voter education materials, e-mail and social media correspondence and GOTV materials.

Publicly Available Materials from the Secretary of State and County Defendants—copies of forms used for voting by mail, serving as an assistant, and similar public forms issued by the Texas Secretary of State.

3. **A computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered; and,**

Plaintiffs have reserved the right to seek attorneys' fees, costs, and litigation expenses. The documents and evidence indicating a right to such specific fees remain privileged until such time as an award of fees and costs is made by the Court.

4. **For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.**

None.

Date: November 5, 2021.

/s/ Ryan V. Cox

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Respectfully submitted,

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**COUNSEL FOR PLAINTIFFS OCA-
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*Application for Admission Pro Hac Vice
Pending

CERTIFICATE OF SERVICE

I hereby certify that on November 5, 2021, a true and correct copy of the foregoing OCA- GREATER HOUSTON ET AL. Plaintiffs' Initial Disclosures was served upon all parties named above via e-mail.

/s/ Ryan V. Cox

Ryan V. Cox